

**EXHIBIT A**

717842

(P)

ROBERT J. CARDONSKY, ESQ.  
FORMAN & CARDONSKY, ESQS.  
701 Westfield Avenue  
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(908) 353-6500  
*Attorney for Plaintiff(s), Michael W. Bishop*

RECEIVED / FILED  
Superior Court of New Jersey

JUN 07 2011

CIVIL CASE MANAGEMENT  
UNION COUNTY

**MICHAEL W. BISHOP,**

Plaintiff

vs.

**LEONIDES PUERTAS, individually and/or  
as agent, servant and/or employee of  
SOUTH GOLD CORP., and SOUTH GOLD  
CORP., individually,**

Defendants

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION : UNION COUNTY

DOCKET NO.: **UNN-L-2208-11**

Civil Action

**COMPLAINT AND JURY DEMAND;  
DESIGNATION OF TRIAL ATTORNEY;  
DEMAND FOR ANSWERS TO  
INTERROGATORIES**

Plaintiff, **Michael Bishop**, residing at 1181 Main Street, Apt. 1G, in the City of Rahway, County of Union and State of New Jersey, by way of Complaint against the Defendants herein says:

**COUNT I**

1) On or about May 9, 2010, the Plaintiff, **Michael W. Bishop**, was the owner and operator of a motor vehicle traveling Northbound on the NJ Turnpike, in the vicinity of milepost marker 102.3, in the State of New Jersey.

2) At the aforementioned time and place, the Defendant, **Leonides Puertas**, was the operator either individually and/or as agent, servant and/or employee of a motor vehicle owned by the Defendant, **South Gold Corp.**, also traveling Northbound on the NJ Turnpike, in the vicinity of milepost marker 102.3, in the State of New Jersey.

3) As a direct and proximate result of the negligent manner in which the Defendant, **Leonides Puertas**, operated the vehicle, either individually and/or as agent, servant and/or employee of the Defendant, **South Gold Corp.**, a collision was caused to occur with Plaintiff's vehicle, causing Plaintiff, **Michael W. Bishop**, to suffer serious personal injuries.

4) As a direct and proximate result of the aforesaid, Plaintiff, **Michael W. Bishop**, was caused to suffer serious injuries in and about his head, limbs and body; he was caused to incur pain and suffering and will in the future be caused to incur pain and suffering; he was caused to incur medical expenses and will in the

future be caused be caused to incur medical expenses; he was caused to lose time from his usual pursuits and occupations and will in the future be caused to lose time from his usual pursuits and occupations; he was caused to incur permanent injuries.

**WHEREFORE**, Plaintiff, **Michael W. Bishop**, demands judgment against the Defendants herein, together with interest and costs of suit.

**JURY DEMAND**

**PLEASE TAKE NOTICE** that the Plaintiff hereby demands a Trial by Jury as to all issues.

**DESIGNATION OF TRIAL COUNSEL**

**PURSUANT** to Rule 4:25-4, Robert J. Cardonsky, Esq., is hereby designated as trial counsel of the within matter.

**FORMAN & CARDONSKY, ESQS.**

By:   
**ROBERT J. CARDONSKY, ESQ.**

Dated: May 31, 2011.

**DEMAND FOR ANSWERS TO UNIFORM INTERROGATORIES**

**PLEASE TAKEN NOTICE** that pursuant to Rule 4:17-1(b)(ii)(2), Plaintiff hereby demands answers to Uniform Interrogatories Form C and Form C(1) within sixty (60) days of the filing of Defendant's Answer to this Complaint.

**FORMAN & CARDONSKY, ESQS.**

By:   
**ROBERT J. CARDONSKY, ESQ.**

DATED: May 31, 2011.

**CERTIFICATION**

Pursuant to the requirements of Rule 4:5-1, I the undersigned, do hereby certify to the best of my knowledge, information and belief, that except as hereinafter indicated, the subject matter of the controversy referred to in the within pleading is not the subject of any other Causes of Action, pending in any other Court, or of a pending Arbitration Proceeding, nor is any other Cause of Action or Arbitration Proceeding contemplated;

1. OTHER ACTIONS PENDING? Yes ☐ NO ☒
- A. If YES – Parties to other Pending Actions.
- B. In my opinion, the following parties should be joined in the within pending Cause of Action.
2. OTHER ACTIONS CONTEMPLATED? YES ☐ NO ☒
- A. If YES – Parties contemplated to be joined, in other Causes of Action.
3. ARBITRATION PROCEEDINGS PENDING? YES ☐ NO ☒
- A. If YES – Parties to Arbitration Proceedings.
- B. In my opinion, the following parties should be joined in the pending Arbitration Proceedings.
4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED? YES ☐ NO ☒
- A. If YES – Parties contemplated to be joined to Arbitration Proceedings.

In the event that during the pendency of the within Cause of Action, I shall become aware of any changes as to any facts stated herein, I shall file an amended certification and serve a copy thereof on all other parties (or their attorneys) who have appeared in said Cause of Action.



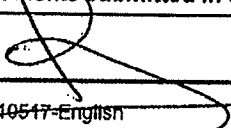
FORMAN & CARDONSKY, ESQS.

By: 

~~ROBERT J. CARDONSKY, ESQ.~~

DATED: May 31, 2011.

## Appendix XII-B1

 <b>CIVIL CASE INFORMATION STATEMENT (CIS)</b> Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 <b>Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</b>		FOR USE BY CLERK'S OFFICE ONLY	
		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. AMOUNT: OVERPAYMENT: BATCH NUMBER:	
ATTORNEY / PRO SE NAME ROBERT J. CARDONSKY, ESQ.		TELEPHONE NUMBER (908) 353-6500	COUNTY OF VENUE Union
FIRM NAME (if applicable) Forman & Cardonsky, Esqs.		DOCKET NUMBER (when available) <b>UNN1-2208-11</b>	
OFFICE ADDRESS 701 Westfield Avenue Elizabeth, NJ 07208		DOCUMENT TYPE Complaint and Jury Demand	
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Michael W. Bishop, Plaintiff	CAPTION Bishop v. Puertas, et al.		
CASE TYPE NUMBER (See reverse side for listing) 603N	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN		
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: 			

Side 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Centrally Managed Litigation (Track IV)**

- |                                  |  |
|----------------------------------|--|
| 280 ZELNORM                      | 290 POMPTON LAKES ENVIRONMENTAL LITIGATION |
| 285 STRYKER TRIDENT HIP IMPLANTS | 291 PELVIC MESH/GYNECARE                   |
| 288 PRUDENTIAL TORT LITIGATION   | 292 PELVIC MESH/BARD                       |

**Mass Tort (Track IV)**

- |                                       |  |
|---------------------------------------|--|
| 248 CIBA GEIGY                        | 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL |
| 266 HORMONE REPLACEMENT THERAPY (HRT) | 282 FOSAMAX                            |
| 271 ACCUTANE                          | 283 DIGITEK                            |
| 274 RISPERDAL/SEROQUEL/ZYPREXA        | 284 NUVARING                           |
| 275 ORTHO EVRA                        | 286 LEVAQUIN                           |
| 277 MAHWAH TOXIC DUMP SITE            | 287 YAZ/YASMIN/OCELLA                  |
| 278 ZOMETA/ARELIA                     | 601 ASBESTOS                           |
| 279 GADOLINIUM                        |  |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

UNION COUNTY SUPERIOR COURT  
2 BROAD STREET  
ELIZABETH NJ 07207

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (908) 659-4817  
COURT HOURS

DATE: JUNE 08, 2011  
RE: BISHOP VS PUERTAS ET AL  
DOCKET: UNN L -002208 11

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON KENNETH J. GRISPIN

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002  
AT: (908) 659-4823.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: ROBERT J. CARDONSKY  
FORMAN & CARDONSKY  
701 WESTFIELD AVE  
ELIZABETH NJ 07208-1327

JUVSODR

